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Attorneys for Defendant  
MADISON REED, INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

MOLLY BROWN and KEPPIE MOORE,  
individually and on behalf of others similarly  
situated,

Plaintiffs,

v.

MADISON REED, INC.,

Defendant.

Case No. 3:21-cv-01233-WHO

**STIPULATION AND ORDER REGARDING  
BRIEFING AND HEARING SCHEDULE  
FOR MOTION TO DISMISS PLAINTIFFS'  
AMENDED COMPLAINT**

Pursuant to Civil Local Rule 6-2 Plaintiffs Molly Brown and Keppie Moore (“Plaintiffs”) and Defendant Madison Reed, Inc. (“Madison Reed” or “Defendant”) (collectively “the Parties”), by and through their respective counsel of record, hereby stipulate as follows:

Plaintiffs’ amended complaint was filed on September 29, 2021 (Dkt. 26).

Madison Reed filed a motion to dismiss on November 12, 2021 (Dkt. 29). Plaintiffs’ opposition is currently due on November 26, 2021 (Dkt. 29), and Madison Reed’s reply is due on December 3, 2021 (Dkt. 29). The hearing on Madison Reed’s motion is currently set for January 5, 2022 (Dkt. 31).

The Parties have met and conferred and agree that additional time is needed to address the various claims and issues and to prepare the opposition and reply papers. Subject to the Court’s approval, the Parties agree that Plaintiffs’ response to Madison Reed’s motion to dismiss the amended complaint shall be due on December 17, 2021 and Madison Reed’s reply shall be due on January 7, 2021. The Parties also agree that the hearing on Madison Reed’s motion to dismiss shall be continued from January 5, 2022 to January 26, 2022.

The Parties previously filed the following stipulations in this action:

1. Stipulation for extension of time to respond to complaint filed on March 8, 2021 (Dkt. 8);
2. Stipulation and proposed order to continue responsive pleading deadline and case management conference; granted on May 13, 2021 (Dkt. 14).
3. Stipulation and proposed order to extending time for Defendant to file its motion to dismiss Plaintiffs’ amended complaint; granted on October 5, 2021 (Dkt. 28).

This requested extension of time will have no other effect on the schedule of the case.

NOW, THEREFORE, IT IS HEREBY AGEEED AND STIPULATED by and between the Parties, through their respective counsel, that Plaintiffs’ opposition to Madison Reed’s motion to dismiss amended complaint is due on December 17, 2021. Madison Reed’s reply is due on January 7, 2021. The hearing on Madison Reed’s motion to dismiss shall be continued from January 5, 2022 to January 26, 2022 at 2:00 p.m.

IT IS SO STIPULATED.

1  
2 Dated: November 22, 2021

REESE LLP

3 By: /s/ Carlos F. Ramirez  
4 Carlos F. Ramirez

5  
6 Attorneys for Plaintiffs  
7 Molly Brown and Keppie Moore

8  
9 Dated: November 22, 2021

SHOOK HARDY & BACON L.L.P.

10 By: /s Amir Nassihi  
11 Amir Nassihi

12  
13 Attorneys for Defendant  
14 MADISON REED, INC.

15 **SIGNATURE ATTESTATION**

16 Pursuant to N.D. Cal. L.R. 5-1(i)(3), I, Amir Nassihi, attest that I have obtained  
17 authorization from the above signatories to file the above-referenced document. I declare under  
18 penalty of perjury under the laws of the United States of America that the foregoing is true and  
19 correct.  
20

21 Executed: November 22, 2021

/s/ Amir Nassihi  
22 Amir Nassihi

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: November 22, 2021

  
HONORABLE WILLIAM H. ORRICK